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Dear Chairman Genachowski:

UNITY Journalists (Formerly known as UNITY: Journalists of Color), is reiterating our call for your commission to make diversity a top priority in your pending 2010 Quadrennial Media Ownership Rule Review. Our organization's strength comes from the diverse representation of our 4,000 journalists in our member groups: Asian American Journalists Association, National Lesbian and Gay Journalists Association, National Association of Hispanic Journalists, and the Native American Journalists Association.

In 2011, a federal court ruled that the FCC must address the impact of any rule change on broadcast ownership by women and people of color.

But we are troubled that the FCC may now move forward with a vote on relaxing media ownership rules -- by lifting the ban that prohibits one company from owning radio, television stations and newspapers in one city -- without first examining the impact on broadcast ownership by women and people of color.

Recently, the FCC released new ownership data that confirms the embarrassingly low level of broadcast ownership diversity in the country. Before any vote takes place, the FCC needs to conduct its own studies on media ownership and properly analyze the information for an honest and complete assessment of minority and female media ownership and the potential impact of rule changes on these ownership levels.

As journalists we understand the vital role media plays in not only educating the public, but also holding other institutions accountable and promoting a robust democracy. A media that fails to reflect and give voice to the population it covers is ill equipped to handle this vast responsibility.

The FCC has a duty to ensure media ownership in radio and television stations is an accurate reflection of our growing diversity. This clearly is not the case today. People of color represent 36% of the nation's population, yet hold about 8% of all radio licenses and just under 4% of television licenses. And while women make up 51% of the country, their combined radio and television license ownership amounts to less than 7%.

Further disheartening, we have seen little effort by the FCC toward pursuing policies that provide people of color and women with a fair shot at media ownership, or even the most basic assessment of how proposed media ownership rule changes will impact media ownership opportunities for these groups.



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As former Commissioner Copps has observed: "In a country now nearly one-third minority, it is shocking, and I think embarrassing, that people of color own barely more than 3% of full-power commercial television stations. We must make a prompt and major commitment to ownership diversity. This certainly includes a Commission commitment to fund the necessary studies to build a record essential to satisfying judicial scrutiny so that we can go from the kind of interim step I have just discussed to the even more aggressive policies that will be needed to bring diversity and justice to our media."

At minimum, the FCC must avoid jeopardizing existing (albeit low) levels of ownership diversity by maintaining the current cross-ownership rules. As consolidation has harmed and continues to harm the ability of people of color and women to own a media outlet, the FCC must enforce existing rules to prevent this from happening and to act proactively to guard against industry efforts to consolidate.

The reality for people of color and women today is a vicious combination of limited media ownership opportunities and increasing consolidation that has pushed out or threatens to push or keep out these underrepresented groups. People of color and women media owners simply don't have the financial muscle to compete with consolidated media giants for programming and advertising revenue. And as these owners are forced out, so goes the diverse programming they fought hard to bring to the public; further showcasing the FCC's neglect to serve a historically marginalized population that already reflects a majority in many parts of our country.

UNITY stands ready to assist the FCC in its mission to ensure fair media representation.